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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LARIME TAYLOR, an individual,
Plaintiff,

VS.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity; CLARK COUNTY, a political subdivision
of the State of Nevada; SHERIFF JOSEPH
LOMBARDO, in his official capacity as Sheriff of the Las Vegas Metropolitan Police
Department; OFFICER YOUNG, as an individual and in his capacity as a Las Vegas
Metropolitan Police Department Officer; OFFICER KRAVITZ, as an individual and
in his capacity as a Las Vegas Metropolitan Police Department Officer; OFFICER
DARRELL LEE DAVIES, as an individual and in his official capacity as a Las Vegas
Metropolitan Police Department Officer; OFFICER WESTON FERGUSON, as an
individual and in his official capacity as a Las Vegas Metropolitan Police Department
Officer; OFFICER THOMAS ALBRIGHT, as an individual and in his official capacity
as a Las Vegas Metropolitan Police Department; OFFICER JANETTE
GUTIERREZ, as an individual and in her official capacity as a Las Vegas Metropolitan
Police Department Officer; OFFICER CLINT OWENSBY, as an individual and in
his official capacity as a Las Vegas

Case No.: 2:19-cv-00995-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
PLAINTIFF'S RESPONSE TO
COUNTY DEFENDANTS'
MOTION TO STAY DISCOVERY
(ECF No. 38)**

(SECOND REQUEST)

Metropolitan Police Department; OFFICER ROBERT THORNE, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer; OFFICER JACOB BITTNER, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer; OFFICER GERARDO REYES, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer; OFFICER MORGAN MCCLARY, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer; OFFICER JAKE FREEMAN, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer; and OFFICER CHRISTOPHER LONGI, as an individual and in his official capacity as a Las Vegas Metropolitan Police Department Officer,

Pursuant to LR IA 6-1, Plaintiff LARIME TAYLOR and Defendants CLARK COUNTY and CLARK COUNTY DEPARTMENT OF PUBLIC WORKS (“County Defendants”), by and through their respective counsel, hereby stipulate and request that this Court extend the deadline to file the Plaintiff’s Response to County Defendants’ Motion to Stay Discovery (ECF No. 38) filed on September 17, 2019 by an additional two (2) days, extending the deadline from October 7, 2019 to October 9, 2019. (*See* ECF No. 50, Order.) This is the second stipulation for extension of time for Plaintiff to file his Response.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following:

Counsel for Plaintiff initiated this request because counsel for the parties were unable to reach an agreement regarding a potential resolution to discovery matters. In addition, counsel for Plaintiff had oral argument in the Nevada Supreme Court on October 7, 2019 in two consolidated cases, *Clark County Office of the Coroner/Medical Examiner v. Las Vegas Review-Journal*, Nev. S. Ct. Case Nos. 74604 and 75095.

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1 WHEREFORE, the parties respectfully request that this Court extend the deadline
2 to file Plaintiff's Response to County Defendants' Motion to Stay Discovery (ECF No. 38)
3 filed on September 17, 2019 to up to and including October 9, 2019.

4 IT IS SO STIPULATED.

5 DATED this the 7th day of October, 2019. DATED this the 7th day of October, 2019.

6 **MCLETCHIE LAW**

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DISTRICT ATTORNEY'S OFFICE

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11 *Department of Public Works*

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14 **ORDER**
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IT IS SO ORDERED.

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19 HONORABLE JUDGE NANCY J. KOPPE
U.S. DISTRICT COURT MAGISTRATE JUDGE
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21 DATED: October 8, 2019
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